

Before the
Federal Communications Commission

Washington, D. C.

In the matter of:)	
)	
Field Repair Requirements for)	RM-10412
Commercially-built Transmitter and)	
Transceiver Equipment for the Amateur)	
Radio Service)	

COMMENTS OF RICH EYRE, K7REC

I am an Advanced Class amateur who holds the call sign K7REC. I was very involved in the creation of LPFM.

Even though I agree with Mr. Leggett on issues around the LPFM service, I have to disagree with the above captioned rulemaking.

For a lot of manufacturers, their lines of equipment for amateur radio are based on their lines of equipment for other commercial radio services and amateur radio equipment use the same components as their counterpart commercial units.

By forcing the equipment manufacturers to adhere to the terms expressed in this petition, it would require them to develop different core designs for amateur equipment. Based on the amount of equipment that is manufactured for the amateur radio market vs. the commercial market, most manufacturers would not find it financially feasible to design amateur radio equipment.

If such rulemaking is imposed, we run the risk of completely losing certain types of amateur radio equipment completely, such as hand-held radios ("HT's").

This rulemaking would also prohibit me from being able to take a commercial land-mobile transceiver and converting it to the Amateur Radio Service since Amateur equipment would have to meet these requirements.

The type of radios that someone decides to use should be their decision. If they want something that is "field serviceable", you may be able to find a pair of Collins S-lines somewhere.

1 - "Appliance Operator" refers to an amateur radio operator who prefers to operate amateur radio equipment that requires no assembly.

Although some may disagree with me when I say that the "appliance operator"¹ is the future of Amateur Radio, it really is. The Amateur Radio Service still produces a lot of people who are knowledgeable in the radio art. Today's radio art also includes surface mount technology.

By even considering this petition, we might as well consider bringing back spark-gap, crystal controlled transmitters for Novice class operators and the Connelrad system.

There are more important issues such as those proposed by the ARRL in RM-10413. I request that the FCC take NO ACTION on this petition.

Rich Eyre, K7REC
P O Box 3002
Scottsdale AZ 85271-3002